

UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

In the Matter of the Search of  
USPS Priority Mail parcel  
9505 5143 4976 7269 0349 48  
addressed to "John Edward, 905 Tiger Dr.  
Columbus, OH 43228."

Case No.

2:17-mj-566

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property

USPS Priority Mail parcel 9505 5143 4976 7269 0349 48 addressed to "John Edward, 905 Tiger Dr. Columbus, OH 43228."

located in the Southern District of Ohio, Eastern Division, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Title 21 USC 841(a)(1)

Offense Description

Possession with intent to distribute  
a controlled substance

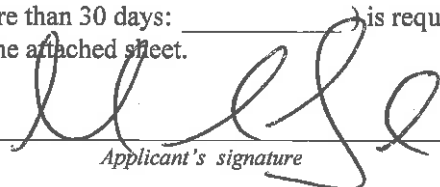
Title 21 USC 843(b)

Prohibited use of a communication center (U.S. Mail)

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector MOHAMED A. SABRAH

- ☐ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

MOHAMED A. SABRAH, U.S. POSTAL INSPECTOR

Printed name and title

Sworn to before me and signed in my presence.

Date: 9/29/2017

City and state: COLUMBUS, OHIO



Judge's signature

NORAH MCCANN KING, U.S. MAGISTRATE JUDGE

Printed name and title

B.S  
9/29/17

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF	)	Case no:
	)	
USPS Priority Mail parcel	)	
9505 5143 4976 7269 0349 48	)	Magistrate Judge
addressed to "John Edward, 905 Tiger Dr.	)	
Columbus, OH 43228."	)	

**Affidavit in Support of Application for Search Warrant**

I, Mohamed A. Sabrah, Postal Inspector, being duly sworn, depose and state as follows:

1. I have been a U.S. Postal Inspector for the U.S. Postal Inspection Service since February, 2016, enforcing federal mail and drug laws; currently assigned to Columbus, OH. I have received training at U.S. Postal Inspection Service National Training Seminars for mail-related criminal investigations and have investigated cases with other federal, state, and local law enforcement units. I have received an additional 40 hour Prohibited Mailings training by the U.S. Postal Inspection Service
2. The U.S. Postal Inspection Service is aware that drug traffickers have been using Priority Mail, a business-oriented service offered by the U.S. Post Office, to transport controlled substances and transfer funds, cash or otherwise, to further their enterprises. As a result of past investigations and prosecutions, the Postal Inspection Service has determined that a number of indicators can be used to identify packages containing contraband that have been entered into the Priority Mail network. Inspectors routinely review shipment documents and Priority Mail packages originating from or destined to drug source areas, to identify instances where there is a possibility of drug trafficking.
3. On September 28, 2017 Inspectors identified a USPS Priority Mail parcel with tracking number 9505 5143 4976 7269 0349 48, following a confrontation between unknown suspects and a U.S. Postal Service Letter Carrier. The Letter Carrier stated that men came up to her in a harassing manner asking for parcel number 9505 5143 4976 7269 0349 48. The Letter Carrier said she notified the unknown suspects that she cannot give them the parcel due to the recipient address being incorrect and the occupants of the residence do not match the box. The Letter Carrier said the unknown suspects left and came back in a different vehicle. At this point in time the Letter Carrier called 911 and the U.S. Postal Inspection Service.
4. On September 28, 2017, Postal Inspectors took custody of USPS Priority Mail parcel with tracking number 9505 5143 4976 7269 0349 48 addressed to "John Edward, 905 Tiger Dr. Columbus, OH 43228", and bearing the return address of "Isaac Perez, 466 Homassel Ave.

Lindsay, CA 93247.” The parcel is a white U.S. Postal Service flat rate cardboard box, and was mailed on September 26, 2017, from Lindsay, CA with \$8.35 postage affixed.

5. According to law enforcement databases, the delivery address of 905 Tiger Dr. Columbus, OH 43228 does not exist.
6. According to law enforcement databases, the return address of 466 Homassel Ave. Lindsay, CA 93247 does not exist.
7. Your affiant knows that in the past, drug traffickers have used unknown names at legitimate addresses to receive parcels containing illegal narcotics, and have used non-existent addresses or addresses belonging to others for the sender/return address, in an attempt to legitimize the shipment in the event that the parcel is seized by law enforcement officers. Additionally, California is a known source area for shipment of illegal narcotics to Central Ohio as well as other areas of the United States.
8. On September 28, 2017, Postal Inspectors contacted Officer Mark Cartwright, Columbus Police Department, who is the handler for “Lilo,” a drug detection dog most recently certified by the Ohio Peace Officers Training Council for the detection of marijuana, hashish, cocaine, “crack”, heroin, and methamphetamine. K-9 “Lilo” has had 200 hours of training at Gold Shield Training Kennels, Blacklick, OH, a well-established and regarded training facility for police canines. Both in training and actual deployments, K-9 “Lilo” has successfully detected narcotics, demonstrating clear, positive, aggressive alerts, and establishing himself as a highly reliable police dog.
9. The subject parcel was hidden among other packages, and “Lilo” was allowed to search the entire area. Officer Cartwright concluded that K-9 “Lilo” did alert positively to U. S. Postal Service Mail parcel bearing label no 9505 5143 4976 7269 0349 48. Based on that alert, Officer Cartwright concluded that the odor of one of the drugs that K-9 “Lilo” is trained and certified to detect was present.
10. Based on the information contained herein, your affiant maintains there is probable cause to believe that the USPS Priority Mail parcel bearing tracking number 9505 5143 4976 7269 0349 48 contains controlled substances, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

11. Based on the facts set forth in this affidavit, I submit that there is probable cause to believe that controlled substances are being concealed in the parcel, and seek the issuance of a warrant to search the parcel for controlled substances to be seized.



Mohamed A. Sabrah  
United States Postal Inspector

Sworn to before me, and subscribed in my presence, this 29<sup>th</sup> day of September, at Columbus, Ohio.



Norah McCann King  
United States Magistrate Judge